



REDACTED VERSION AVAILABLE FOR PUBLIC INSPECTION

June 23, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

Accepted / Filed

JUN 23 2017

Re: **WC Docket No. 14-58**
Sprint Corporation Form 481

Federal Communications Commission
Office of the Secretary

DOCKET FILE COPY ORIGINAL

Dear Ms. Dortch:

Sprint Corporation ("Sprint"), on behalf of Virgin Mobile USA, hereby submits its Form 481 reports in accordance with Section 54.422 of the Commission's Rules (47 C.F.R. § 54.422). A Form 481 is being submitted for each of the 42 jurisdictions in which Virgin Mobile USA was designated a Lifeline-only ETC. As each Form 481 included two common attachments (a letter from CTIA to Sprint advising that Sprint is deemed compliant with the Voluntary Consumer Code, filed in support of Line 500 of Form 481; and a document entitled "Sprint Business Continuity Program Overview," filed in support of Line 600 of Form 481), only one copy of these attachments is included in the instant filing.

The Form 481 for 4 states (NH, NY, NC, and TN) includes information relating to network outages for which confidential treatment is requested. An original plus one copy of the unredacted form, marked "CONFIDENTIAL, NOT FOR PUBLIC INSPECTION," are being submitted in paper format. An original plus one copy of the redacted form, marked "REDACTED, AVAILABLE FOR PUBLIC INSPECTION," also are being submitted in paper format.

The Form 481s for Virgin Mobile's remaining 38 states are being filed electronically in WC Docket No. 14-58.

If you have any questions, please contact me at (703) 433-4503.

Respectfully submitted,

/s/ Norina T. Moy

Norina T. Moy
Director, Government Affairs

Enclosures

No. of Copies rec'd 0+1
List ABCDE



Meredith Attwell Baker

August 8, 2016

Mr. Marcelo Claure
President & Chief Executive Officer
Sprint Corporation
6200 Sprint Parkway
Mailstop: KSOPHF0410-4A421
Overland Park, KS 66251

Dear  Marcelo:

Congratulations! This letter is to notify you that Sprint Corporation ("Sprint") and the Sprint Prepaid Group (Virgin Mobile USA, Boost Mobile, and Assurance Wireless) have completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2016 – December 31, 2016, and are deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless are authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, CTIA will provide two specimens (color and black/white) of the Seal for use on Sprint's, Virgin Mobile USA's, Boost Mobile's and Assurance Wireless' respective websites and in their respective collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Kathryn Dall'Asta, CTIA's Associate Counsel, at (202) 736-3677 or kdallasta@ctia.org.

CTIA commends Sprint for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with Sprint on this important industry initiative.

Sincerely,



Meredith Attwell Baker

cc: Charles McKee, VP Government Affairs

Attachment



Sprint Business Continuity Program Overview 2016

Table of Contents

Executive Summary	3
Sprint Business Continuity Mission Statement.....	3
Executive Sponsorship and Program Governance.....	3
Risk Management	4
Business Impact Analysis	5
Business Continuity Strategies and Planning	5
Continuous Improvement and Maturity	6
Awareness and Training	7
Incident Management and Crisis Communications.....	8
Information Technology	9
National Security & Compliance (NSC).....	10
Network	10
Sprint's Emergency Response Team (ERT).....	12
Contact Sprint's ERT:	13

Executive Summary

As businesses, government agencies, and individual consumers become more and more reliant on wireline and wireless communications, as well as remote access to information, the concept of business continuity has never been more important. Sprint incorporates business continuity as part of the corporation's overall business philosophy. This philosophy promotes utilizing business continuity principles, guidelines, and standards by all company employees during routine business operations to assure the continuation of Sprint's mission critical business operations and services. The goal of Sprint's Business Continuity (BC) program is to minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Industry accepted principles are the basis for Sprint's BC program. Sprint has adopted key principles from standards set by organizations such as the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, Federal Emergency Management Agency (FEMA), Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, International Organization for Standardization (ISO) 27001 and ISO 22301 and several Military Specifications (Mil-Spec) standards.

Sprint's Business Continuity Program Overview is reviewed and approved on an annual basis.

Sprint Business Continuity Mission Statement

Assure the continuation of Sprint's mission critical business operations and services. Minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Executive Sponsorship and Program Governance

A comprehensive business continuity program requires executive sponsorship, a structure for decision-making, and a means to direct and manage incremental changes towards goals and objectives. Sprint's program governance structure achieves each of these requirements and accomplishes them through inclusion and diversity of thought and viewpoint.

Sprint Business Continuity Program Governing Principles:

- Committed to employee and customer safety
- Committed to preserving business operations and service to Sprint customers
- Business continuity is a shared responsibility across all levels of management, all business units (BUs), the Business Continuity (BC) professionals within the BUs and the Business Continuity Office (BCO)
- Business continuity professionals and Incident Management Teams (IMTs) must be knowledgeable, well trained and prepared to respond when activated
- Continual improvement, flexibility and maturity is necessary for success

The following describes the program governance structure that begins with the highest levels of the company and leverages management and expertise for optimal effectiveness.

Executive Business Continuity Sponsors: BU senior level executive sponsors promote business continuity awareness, performance and maturity among all areas of the company. Each sponsor assigns subject matter experts and BC coordinators to make available appropriate resources to BC planning efforts for their business unit. The executive sponsors provide support to Sprint's Business Continuity Office (BCO) in overseeing BC-related

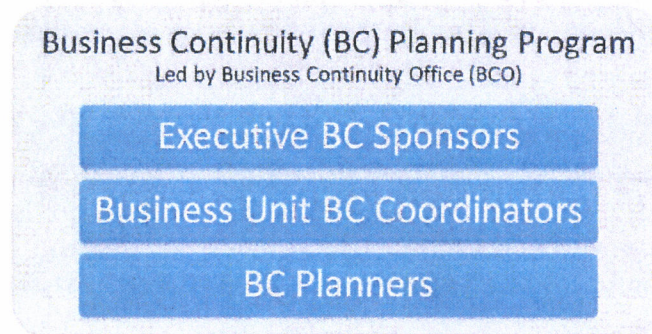
activities, performance and ensuring adherence and accountability of Sprint's BUs to BC program policies and standards.

Business Continuity Office (BCO) - The BCO is responsible for establishing the policy, structure, and methodology for developing, maintaining, and testing enterprise-wide BC and Disaster Recovery (DR) plans. During an incident, the BCO is responsible for coordinating cross-functional incident management activities of Sprint's Enterprise Incident Management Team (EIMT) and informing senior leadership of impacts and progress.

Business Unit Business Continuity Coordinators: BC coordinators are accountable for BU planning implementation and completion in accordance with BC program elements, as defined by the BCO, for their assigned department and executive sponsor.

Business Continuity Planners: BC planners are responsible for documenting and maintaining business continuity plans in Sprint's Business Continuity Management System (BCMS).

Proactive Governance Structure



Risk Management

Upon identification of potentially significant risks, Sprint makes every attempt to mitigate and plan for any eventuality that could affect Sprint's customers and employees. Sprint's business continuity risk program is integrated with the company's Enterprise Risk Management (ERM) process led by Corporate Audit Services (CAS) which plays a critical role in Sprint's overall success by partnering with business units to manage risk and optimize business performance. CAS has the unique opportunity to touch all facets of the company and interact with all levels of management in providing unbiased, risk-based assessments of business processes.

Risk Council: The ERM includes a Risk Council on which Managers and Directors sit. The Risk Council's purpose is:

- Risk identification
- Risk self-assessment
- Strategy and actions to address risk within policy
- Ensure compliance with ERM policies and procedures

- Provide assertions on risk exposure

Risk Steering Committee: The Risk Steering Committee is made up of Vice Presidents and Senior Vice Presidents. Their purpose is:

- Provide a strategic view of risk
- Recommendation of key risks/unforeseen events

Business Impact Analysis

Through various forms of examination, including Business Impact Analysis (BIA), criticality of every part of the business (business processes, applications, suppliers, partners, sites, network elements and other business aspects) is determined. The criticality defines how long these elements can be disrupted without significant impacts to the company's employees, customers, operations and/or assets. This prioritization drives mitigation and planning decisions. Critical business processes require a comparable criticality assigned to the applications they use, the suppliers they need and other dependencies. Sprint's classification levels for criticality include, but are not limited to, Mission Critical, Business Critical, Enhanced Support and Standard Support.

BIA reviews are conducted on a scheduled basis according to the criticality of the process, system or application. The processes, systems and applications deemed most critical are reviewed on a more frequent basis than those that are less time sensitive.

Business Continuity Strategies and Planning

Sprint uses an internally developed maturity model for benchmarking the BC program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

- **Process, Standards & Documentation**– Common terminology, methodologies and formal documentation on standards and procedures help our large company stay consistent and current. All key stakeholders are responsible for reviewing program documents at least annually.
- **Reporting** – Each year, the Business Continuity Office formally reports to Sprint's Executive Management on the efforts and status of the Business Continuity Program and partners with Corporate Audit on reporting risk information to the Board of Directors.
- **Maintenance** – Frequent reviews of plan details and processes are updated in a timely manner, following changes to contacts, suppliers, processes, organizational structures, etc.
- **Supplier Business Continuity** – Evaluation process of business continuity plans for key partners, suppliers and vendors of which Sprint is dependent upon.

Analysis of potential vulnerabilities and/or new emergent threats is completed on a regular basis. The BCO is responsible for development and implementation of enterprise strategies available to all BC Planners for use in the BC planning and maintenance processes. Examples of enterprise strategies include:

Alternate Site and Remote Access: Sprint utilizes information obtained through BIA and risk reduction strategies in order to preserve business functions that are required in the face of a disaster. Depending on the size and scale of the event, Sprint has strategies in place to provide added capacity, alternative work locations and remote access if necessary to retain operations.

Business functions that require alternate sites, geographic redundancy and remote access capabilities are identified proactively and plans are periodically reviewed and revised as necessary in anticipation of any event. As Sprint has international operations, alternate site locations vary.

Employee Continuity: Sprint has matured its former “Pandemic Continuity” Plan into “employee continuity” plans which incorporate events that may result in employee injuries or fatalities or significant and sustained employee absenteeism. Examples include a pandemic or infectious disease that poses life-threatening risks to employees and their families, a company-owned building roof collapse, or an unplanned school closing due to a natural or a man-made disaster requiring parents to be absent from the work place. Sprint has a designated internal structure responsible for impact assessments and decision making during an employee continuity event as well as proactive planning to identify emerging threats and new strategy implementation. As Sprint’s business continuity plans are developed with an “all-hazards” mindset, employee continuity strategies such as remote work, increased office cleanings and social distancing are considered in all plans.

Continuous Improvement and Maturity

In BC planning, as in other disciplines, it is important to document and test plans for effectiveness. Based on the results, updates to the plans are made. That is the basis of the **Plan-Do-Check-Act** model.

In the **Plan** phase, teams and experts analyze conditions and capabilities and devise objectives, controls, processes and systems to improve Sprint’s ability to prepare or respond to a disruption.

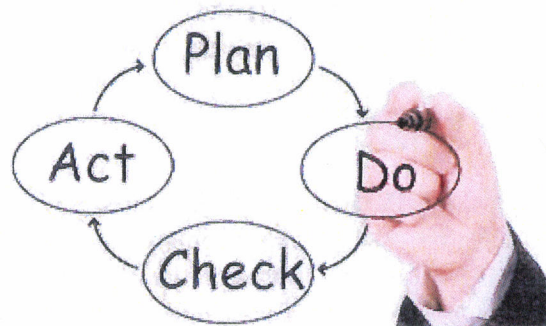
In the **Do** phase, teams exercise or implement the elements according to the plan(s) and ensure they operate according to assumptions/beliefs. This phase may include a test, exercise or real disruption requiring business continuity plan execution.

Exercises: Sprint’s response organizations use exercises to evaluate plans, educate personnel, test functions, and operational capability. Sprint conducts at minimum an annual exercise of its business continuity plan. Additionally, as part of the nation’s critical infrastructure, Sprint participates in coordinated situation drills with FEMA, the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster. The most common types of exercises conducted are tabletop, walk-through, and functional drills. The type of exercise varies as they are dependent upon needs assessments, priority, recent plan executions, budget, etc. Information related to these exercises is proprietary to Sprint.

In the **Check** phase, teams monitor and review the performance of the plans and look for opportunities for improvement. In many cases, lessons are learned from actual practices that were missed in the Plan phase. Lessons learned may be obtained from tests, exercises or real disruptions requiring business continuity plan execution.

After Action Reviews (AAR): Following an exercise or a plan execution in response to a disruption, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as lessons learned and tracked to satisfactory completion in the **Act** phase.

In the **Act** phase, changes may be necessary to the original objectives, controls, processes and systems in the original plan(s). It may be necessary to upgrade capabilities in a specific area or to change tactics or strategic assumptions. Plan(s) are then updated in accordance with lessons learned in the Do, Check and Act phases. Once plans are updated, the cycle resumes, resulting in continuous improvement.



Awareness and Training

Sprint's Business Continuity Office (BCO) is responsible for assessing business continuity awareness and training needs of the company's employees and management so that they are prepared to respond during an incident.

Awareness: On an annual basis the BCO leads a cross-departmental awareness committee whose charter is to identify appropriate opportunities to promote BC awareness and to plan and conduct campaigns and events to meet the needs of employees. The committee develops an annual BC awareness calendar at the beginning of each year with the intent to target specific, recurring events with a messaging campaign. The awareness program covers all aspects of the BC discipline and targets different audiences with specific messaging and information that is appropriate for their role in the company.

Training: Sprint's business continuity training program covers all aspects of the BC discipline and targets different audiences with specific messaging and information that is appropriate for their role in the company. Training also covers tools such as the Business Continuity Management System (BCMS) and the use of Sprint's mass notification system, for employees who have roles in incident response. Members of Sprint's Enterprise Incident Management Team (EIMT) are required to participate, at minimum annually, in enterprise training sessions facilitated by the BCO.

Additionally, an annual, all-employee policy compliance certification program includes elements of business continuity awareness and training.

Incident Management and Crisis Communications

Knowing that unexpected events occur, Sprint's Incident Management and Crisis Communications teams are highly trained and tested. As with the overall program governance structure, full executive support and authority is integrated into the incident management structure. Sprint's seasoned professionals, across multiple fields of expertise, have responded to a wide variety of major disasters.

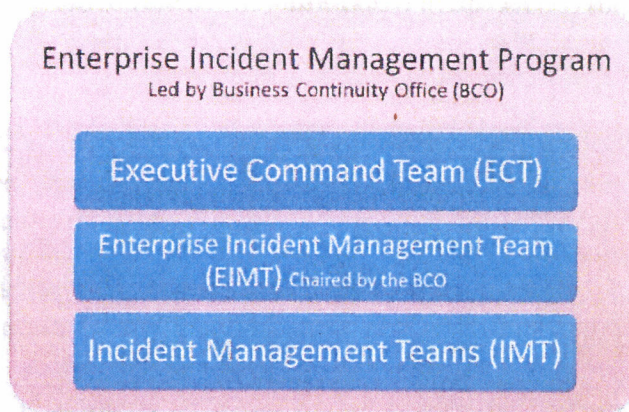
Executive Command Team (ECT) – The Executive Command Team (ECT) is a select group of the senior leadership team with the highest level of authority for strategic and/or tactical decisions in response to an incident. The Chief Executive Officer (CEO) is the Chairperson of the ECT. During a disaster, the ECT is kept apprised of all activities and status. If the incident requires senior executive involvement, the ECT members engage to provide guidance and approval to make necessary response and recovery decisions.

Enterprise Incident Management Team (EIMT) – Chaired by the Business Continuity Office (BCO), the Enterprise Incident Management Team (EIMT) convenes quickly as a way of sharing impact, status and critical decision-making during an incident. This team is flexible and scalable and considers many different threats and hazards as well as the likelihood they will occur.

Incident Management Teams (IMTs) – An IMT consists of members of a single business unit and is designed to meet the needs of the company, customers and employees at the time of an incident. IMTs are of varying size and complexity, capable of responding quickly and effectively to a wide array of issues. Each IMT has a designated chairperson that represents their organization on the EIMT call when the incident requires an EIMT response posture.

Crisis Communications Team (CCT): During an incident, communication needs are more urgent and requiring tailoring depending on the information and the audience. Corporate Communications, Human Resources (HR) and Legal IMTs form Sprint's Crisis Communications Team (CCT). The CCT is responsible for complex and targeted internal communications to employees and/or management and for media and public relations.

Incident Management Governance



Information Technology

IT Continuity, Planning and Recovery (CPR) proactively integrates business continuity and disaster recovery methodology into every phase of IT Operations in order to facilitate rapid response and resolution to any critical business disruption. The IT CPR process is developed to minimize the incident duration and expedite and control the recovery efforts. IT CPR provides a structured approach for responding to unplanned incidents that threaten IT infrastructure, which includes hardware, software, networks, processes and people. IT CPR is responsible for business continuity planning for all IT assets located in Data Centers, Sprint owned Call Centers, Retail Stores and general office facilities.

Application Recovery Strategy: IT identifies and prioritizes the recovery of IT applications by using the Design for Criticality' (D4C) process which follows the business strategy of "Serve, Sell, Bill, Report". This criterion allows IT to assess and align each application based on the business function and impact to Sprint. An application alignment process is used to determine the priority of the application in the recovery timeline. These priorities relate to the tolerance level of the applications and systems and the length of downtime after a disaster. Recovery time objective(s) (RTO) and recovery point objective(s) (RPO) are assigned by D4C.

Data Center Resiliency Planning: Sprint Data Centers are held to exceptionally high and stringent industry standards, but more importantly, self-imposed standards of structural design, engineering, technology, redundancy, security, maintenance and 24x7 operations. Data Centers are geographically diverse and serve as alternate site failovers for each other. Strategic IT vendors critical to Sprint operations are in scope for IT Continuity, Planning and Recovery (CPR) planning solutions.

Sprint Contact Center IT Resiliency Planning: Sprint contact centers have proven failover processes. IT CPR is responsible for providing the centers with recovery planning for IT assets such as:

- Network
- Desktop

- Server
- Voice Technologies

Sprint Retail Store IT Resiliency Planning: IT CPR provides support to Retail facilities by leveraging existing Sprint strategies to ensure functionality and communications between stores and the Sprint Enterprise.

National Security & Compliance (NSC)

The NS&C team works to improve the physical and cybersecurity of Sprint's critical infrastructure and facilitates information sharing within and across the communication industry and government. Today's threat environment highlights the need to protect our Nation's critical functions that support national and economic security and public safety. A partnership leveraging public and private sector capabilities is essential for providing a realistic approach for protection and response.

The NS&C team is the primary point of contact to the Department of Homeland Security during times of increased threat or attack and during significant all hazards events. Members of the NS&C team serve as Sprint's onsite representatives at the Department of Homeland Security's National Coordinating Center (NCC) for Communications; to provide a line of communication between corporate leadership, other telecommunication providers and government officials. This partnership supports the mission of the NCC who leads emergency communications response and recovery efforts under Emergency Support Function #2 of the National Response Framework.

Network

As a Mobile Telecommunications Leader, the resiliency of Sprint's network is of paramount interest to our customers.

Network Incident Management Team: Network Services' implementation of the Incident Command System (ICS), stays true to the principles of ICS. This enables Sprint to leverage this best practice in wide-scale responses, using common terminology and standard organizational structures to communicate efficiently internally and with external customers such as Public Safety agencies as many of these agencies utilize ICS. Teams train on and deploy in standard ICS sections, branches, units and strike teams, and emphasize span of control, comprehensive resource management, and other ICS principles.

Network teams leverage Sprint tools such as hardened GPS-enabled phones, wireless modems, custom applications, M2M solutions and smart phones to aid in situation assessment, response and resource tracking. The teams also maintain a pool of Satellite phones as a contingency for use in restoration. Teams continue to create innovative response tools, such as the unique backhaul called Satellite Cell on Light Trucks (SatCOLTs) that enable restoration of service when a traditional backhaul is not available.

When the Network IMT receives notification of an actual or potential situation that requires activation (hurricane, earthquake, regional power outage, other event where business as usual would not resolve the situation), a virtual Emergency Operations Center (EOC) is established. This EOC performs an initial overall assessment, establishes monitoring bridge(s), coordinates between agencies impacted by the event, assigns tasks, gathers status information and performs executive notifications at prescribed times.

Cell Site Disaster Planning: Sprint's priority site restoration plan focuses resources and expedites recovery by making sure that existing infrastructure is operating properly under normal circumstances and by having a response plan for abnormal circumstances. To accomplish this, Sprint has implemented a detailed preventative maintenance program to insure all systems and redundant equipment are in proper working order. Sprint sites are equipped with battery backup. Some sites have fixed generators or fuel cells for additional back-up power. Sprint maintains a fleet of mobile generators deployable to Sprint service areas. Formal cell site classification designates all sites for criticality. Prioritization aids in properly allocating response personnel, generators and other resources.

Cellular Network Disaster Planning: Communications from Sprint cell sites are backhauled with various combinations of Ethernet, copper, fiber, and microwave systems. Most Sprint hub locations are placed on bi-directional fiber rings. These rings significantly reduce the chance of network failure due to third party fiber damage, equipment failures or other potential causes of service interruptions. Sprint's radio network provides significant overlapping coverage areas which often allow cell sites to fully or partially compensate for a neighboring cell site. In an effort to minimize service impact when a site is down, Sprint maintains a fleet of Cell Sites on Wheels (COWs) which are portable self-contained cell sites. COWs can be deployed to restore coverage from a damaged site or provide additional capacity in the immediate vicinity of an incident.

Switch Disaster Planning: Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at switch locations. Switch locations have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster recovery issues. Most switches also have tap boxes that readily connect to the output of a portable generator in the event of primary generator issues.

Overall Network Performance Management Efforts: The performance of Sprint's networks is monitored 24 hours a day, 7 days per week and 365 days a year by the Network Monitoring Centers. In addition, local switching offices staffed by trained technicians and management coordinate with these larger operations centers, to ensure that Sprint's networks are properly maintained.

Network Restoration Prioritization: Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery teams to establish customer prioritization once the backbone, TSP (Telecommunications Service Priority) and Critical Life Circuits are re-established. Sprint has an established cell site classification and service restoration process.

Special Event Planning: Special events have the potential for adversely affecting the customer experience due to greatly increased wireless traffic demands. Sprint has a mature special events process with dedicated project management personnel and a cross-functional management tool. Teams archive records of recurring special events and leverage capacity planning teams in implementing enhancements to optimize the customer experience. Sprint has used its experience in managing very large temporary users at NASCAR events to manage other special events. As an example, Sprint interfaces with the NCC (National Coordinating

Center for Communications) in managing capacity needs at National Special Security Events, NSSE.

Sprint's Emergency Response Team (ERT)

The Sprint Emergency Response Team (ERT) is the first of its kind and was created in 2002. One of the industry's largest and most advanced disaster response programs, Sprint's ERT specializes in short-term, rapidly deployable, highly mobile and self-sustaining solutions that can provide critical communication and connectivity virtually anywhere, anytime. The ERT is an experienced, cross functional group, which consists of a national team of full time, dedicated personnel as well as over a thousand of ERT Reservists across the country.

Sprint ERT's innovative Rapid Deployment Solutions* provide an easily deployable and scalable set of voice, video, mobile data, hi-speed dedicated internet access, temporary managed Wi-Fi solutions and mobile devices to government agencies, public safety, the military, first responders, K-12 and University campuses, the healthcare community and private companies during declared emergencies, field training exercises, National Special Security Events (NSSE) and short-term special events. When either an emergency or planned event happens, Sprint ERT's rapidly deployable solutions seamlessly augment existing government or corporate communication infrastructures, working hand-in-hand with an agency or corporation's personnel and allows an entity to concentrate on vital operations instead of technical issues.

Sprint's ERT provides a comprehensive response to government and corporate critical communications requirements for cellular services, including 4G LTE, as well as Satellite IP/VSAT Services. Sprint ERT's Mobile Device and Satellite Solutions:

- ERT Satellite Backhauled Cellular Voice, 4G LTE, and Satellite IP (VSAT) Solutions
 - ERT Satellite Cell on Light Trucks (SatCOLTs)
- ERT Satellite IP (VSAT) Solutions
- ERT Satellite Fly-Away-Kit (FAK)
- ERT Satellite IP Trailer
- Fixed Antenna and Customer Deployable Portable Solutions
- Multiple Contracting Options for Sprint ERT Satellite Solutions
- ERT Mobile Devices
 - ERT Go-Kits
 - ERT Rental Program
- ERT Professional Services

** ERT services, product availability and pricing are subject to change at Sprint's sole discretion. Additional terms and conditions may apply.*

Sprint ERT also offers programming, training and technical support in a variety of areas. Agencies and corporations cannot tolerate a business continuity plan with a steep learning curve; it must work the first time an emergency tests it. Sprint's ERT enables an agency or corporation to rest easily, knowing their solution is built with a robust, reliable, and tested program design where tasks are performed by Sprint ERT to avoid straining the agency or corporation's resources.

Sprint's Commitment to Public Safety through EOC Partnerships:

Sprint is dedicated to maintaining contact with key Emergency Operations Centers (EOC) during major disasters and special security events. A process is in place for Sprint to support and communicate with state and county EOC's to help facilitate situational awareness.

Benefits of the EOC Information Sharing Partnership

- Sprint can respond to the EOC's needs for recovery information and information sharing to facilitate situational awareness.
- Obtaining critical information from the EOC that will aid Sprint in its recovery and restoral process (e.g. curfews or road closures for field restoration crews or generator deployment).
- Making key contacts within the EOC (EOC lead, utility representatives, other ESFs).
- Communicating EOC priority areas for recovery back to Sprint.

Value of Sprint's EOC Staffing Strategy for Public Safety:

- Sprint is able to provide information and status updates to the EOCs on pertinent network recovery efforts.
- The State EOC can provide direction on where *their* priority disaster areas are for Sprint to restore the network.
- Sprint can obtain information from the other Emergency Support Functions such as ESF-12; Energy/Power that helps determine where to deploy our network recovery assets.
- Proper credentials that allow our network technicians to pass through area access points that are otherwise restricted to the public.
- Obtain locations of FEMA and other emergency responder command posts, to help Sprint plan for the influx of users/increase network capacity needs.
- Overall, it is a way for Sprint to be proactive, not reactive, in the response and recovery efforts that may impact our communities.

Contact Sprint's ERT: For more information on Sprint's Emergency Response Team, please visit us at:

- www.sprint.com/ert
- Become a fan on Facebook at www.facebook.com/SprintEmergencyResponseTeam
- Email us at ERTRequests@sprint.com
- Or contact our 24x7x365 ERT Hotline at 1-888-639-0020 (GETS users call 254-295-2220)

REDACTED,
AVAILABLE FOR
PUBLIC INSPECTION

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3050-0595/OMB Control No. 3050-0813
July 2013

<010> Study Area Code	129005
<015> Study Area Name	Virgin Mobile USA LP
<020> Program Year	2018
<030> Contact Name: Person USAC should contact with questions about this data	Andrew M. Lancaster
<035> Contact Telephone Number: Number of the person identified in data line <030>	9137626107 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	andy.m.lancaster@sprint.com
Form Type	54.422

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	129005
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Andrew M. Lancaster 9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

<210> For the prior calendar year, were there any reportable voice service outages?

Yes

[illegible]

**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code

129005

<015> Study Area Name

Virgin Mobile USA LP

<020> Program Year

2018

<030> Contact Name - Person USAC should contact regarding this data

Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030>

9137626107 ext.

<039> Contact Email Address - Email Address of person identified in data line <030>

andy.m.lancaster@sprint.com

<300> Unfulfilled service request (voice)

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

<330> Detail on attempts (broadband)

Name of Attached Document

[400] Number of Complaints per 1,000 customers
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	129005
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@print.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	Offered only mobile voice
<410>	Complaints per 1000 customers for fixed voice	
<420>	Complaints per 1000 customers for mobile voice	0.817
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<440>	Complaints per 1000 customers for fixed broadband	
<450>	Complaints per 1000 customers for mobile broadband	

**(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form**FCC Form 481
OMB Control No. 3060-0886/OMB Control No. 3060-0813
July 2013

<010>	Study Area Code	129005
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	Yes

(600) Functionality in Emergency Situations Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	129005
<015> Study Area Name	Virgin Mobile USA LP
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035> Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	129005NH610.pdf

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481
OMB Control No.
July 2013

Study Area Code
<010>

129005

<015>	Study Area Name
-------	-----------------

Virgin Mobile USA LP

<020>	Program Year
-------	--------------

2018

<030> Contact Name - Person USAC should contact regarding this data

Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030>

9137626107 ext.

<039> Contact Email Address - Email Address of person identified in data line <030>

andy.m.lancaster@sprint.com

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

[illegible]

andy.m.lancaster@sprint.com

[illegible]

<010>	Study Area Code	129005
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com
<810>	Reporting Carrier	Virgin Mobile USA LP
<811>	Holding Company	Softbank Corp.
<812>	Operating Company	Virgin Mobile USA LP

[illegible]

(1000) Voice and Broadband Service Rate Comparability
Data Collection Form

FCC Form 451
OMB Control No. 3060-0936/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	129005
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

<1000> Voice services rate comparability certification

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0936/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	129005
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@print.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers**Lifeline****Data Collection Form**

FCC Form 481

OMB Control No. 3060-0086/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 129005

<015> Study Area Name Virgin Mobile USA LP

<020> Program Year 2018

<030> Contact Name - Person USAC should contact regarding this data Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030> 9137626107 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> andy.m.lancaster@sprint.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP

<http://www.aasurancewireless.com/Public/TermsandConditions.aspx>

Name of Attached Document

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2015) Price Cap Carrier Additional Documentation

Data Collection Form

Including Date of Return Carriers affiliated with Price Cap Large Exchange Carriers

FCC Form 487

OMB Control No. 3060-0965/OMB Control No. 3060-0019

July 2013

<010> Study Area Code

129005

<015> Study Area Name

Virgin Mobile USA LP

<020> Program Year

2018

<030> Contact Name - Person USAC should contact regarding this data

Andrew M. Lancaster

<030> Contact Telephone Number - Number of person identified in data line <030>

9137626107 ext.

<039> Contact Email Address - Email Address of person identified in data line <030>

andy.m.lancaster@sprint.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>

3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.

<2022>

Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.

<2023>

The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.

<2024A>

Round 2 Recipient of Incremental Support?

<2024B>

Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.

<2025A>

Round 2 Recipient of Incremental Support?

<2025B>

Attach geocoded information for Phase I milestone reports (Round 2 for year three) - Connect America Fund, WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).

<2015>

2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including rate of return carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

Name of Attached Document Listing
Required Information

<010>	Study Area Code	129005
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan
 Carrier certifies to 54.313(f)(1)(iii)

(3010A)	Certification of Public Interest Obligations (47 CFR § 54.313(f)(1)(i))		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	<input type="text"/>
(3012A)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))		
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	<input type="text"/>
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	<input type="text"/>
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	<input type="text"/>

<010>	Study Area Code	125005
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andv.m.lancaster@virginint.com

Financial Data Summary

(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

<010>	Study Area Code	129905
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@vprint.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information _____

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information _____

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information _____

**Certification - Reporting Carrier
Data Collection Form**

 PCC Form 481
 OMB Control No. 3060-0086/OMB Control No. 3060-0015
 July 2013

<010> Study Area Code	129005
<015> Study Area Name	Virgin Mobile USA LP
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035> Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: Virgin Mobile USA LP	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/19/2017
Printed name of Authorized Officer: Jay Franklin	
Title or position of Authorized Officer: Assistant Controller	
Telephone number of Authorized Officer: 9137625987 ext.	
Study Area Code of Reporting Carrier: 129005	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3068-0266/OMB Control No. 3068-0813 July 2013
---	--

<010> Study Area Code	129005
<015> Study Area Name	Virgin Mobile USA LP
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035> Contact Telephone Number - Number of person identified in data line <030>	9137626107 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	